

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of:

Schools and Libraries Universal Support Mechanism

CC DOCKET No. 02-6

Reply Comments Submitted by the
National Association of State Telecommunications Directors

The National Association of State Telecommunications Directors (NASTD) represents the state agencies authorized by their respective state legislatures to provide telecommunications and information services. In many cases the contracts for these services are also available to local governments, universities and colleges. NASTD members procure and manage state telecommunications networks (STN) within their respective states pursuant to a system of competitive bidding mandated by state procurement laws. These networks are almost always acquired under contract with common carrier providers operating under a STN network contract or related services.

Many states represented in NASTD provide telecommunications services to schools and libraries, as well as rural health providers, through competitively bid master contracts used to gain the benefits of aggregation. Like the Council of Chief State School Officers (CCSSO) and the American Library Association (ALA), NASTD has conducted regularly scheduled conference calls and annual training with the Administrator's staff to increase awareness, outreach and understanding of the universal service program since 1998. Many NASTD members assist with applications and initiate state consortia applications. While some schools and libraries are required to use STN contracts along with state agencies, the majority elect to use these state master contracts on a voluntary basis.

The volume discounts obtained from the purchasing power of aggregated government needs lower the cost per unit of service for all government entities on the STN. This is of particular value to schools and libraries of small size and limited resources and is the only practical means for them to obtain telecommunications services. It more importantly maximizes the available discount funding to further the intended purposes of the program. NASTD continues to offer its assistance in maximizing the utilization of eligible services and strives to avoid unintended consequences where applicants must choose between compliance with state and local procurement law and universal service fund discounts.

STN contracting promotes competition and furthers the Commission's other goals of broadband deployment in rural areas. These capacities are more recently being utilized as part of collective efforts to reinforce homeland security. Use of these state master contracts also furthers common goals of streamlining and lowering administrative costs. It also avoids unnecessary duplication of resources and ensures interoperability among public telecommunications components.

While the Commission has demonstrated caution in its rules regarding STN eligibility to receive discount funding, we would suggest that strengthening the Administrator's discretion when applicants use STN contracts could alleviate administrative burdens, strengthen the reach of available funding, and avoid abuse of the program.

NASTD supports the CCSSO comments in general and particularly with eligible service procedures and classification. Simplification of this area of the program is essential to reducing the administrative burdens, making the program more user friendly, while avoiding waste and abuse.